



Daniel Richland <drichtland@rflegal.net>

Re: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

1 message

Daniel Richland <drichtland@rflegal.net>

Fri, Sep 23, 2022 at 4:54 PM

To: "Steinlight, Stephen J." <Stephen.Steinlight@troutman.com>

Stephen,

On page 36, it says, "FORCE PAY DEBIT MEMO rev SARASOTA SEVEN" for \$120,391.95. Can you please advise what that means?

On page 46 it says, "CASH DISB SARASOTA SEVEN B3 BUILDERS LLC CUSTOMER ID" \$120,391.95. Can you please advise what that means?

Does Truist have any information about where the First Class Distribution checks and Wasik Ventures check were deposited?

On Fri, Sep 23, 2022 at 4:10 PM Steinlight, Stephen J. <Stephen.Steinlight@troutman.com> wrote:

Daniel,

Please see attached.

Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com**troutman pepper**

875 Third Avenue
New York, NY 10022
troutman.com

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From: Daniel Richland <drichtland@rflegal.net>**Sent:** Friday, September 2, 2022 3:34 PM**To:** Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>

Cc: Forte, Stephen <stephen.forte@offitkurman.com>

Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

EXTERNAL SENDER

Stephen,

You objected to every demand on the basis of a motion for a stay where you have no present stay. You produced zero (0) documents. I am open to compromise, but you need to identify where those areas are. Right now, you are asking me to go through my own demands and tell you which ones I want you to actually answer. Right now, that answer is all of them.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
5 Fairlawn Drive, Suite 204
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
drichland@rfllegal.net

Queens Office:
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28-07 Jackson Avenue, 5th Fl.
Long Island City, New York 11101

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From: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>

Sent: Friday, September 2, 2022 3:32 PM

To: Daniel Richland <drichland@rfllegal.net>

Cc: Forte, Stephen <stephen.forte@offitkurman.com>

Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

Daniel,

What are we doing here? Seriously. You are talking in circles without any negotiation movement or compromise.

Again, I will quote myself from my prior email wherein Truist made multiple suggestions to avoid motion to compel practice:

"Since Precision wants to put this discovery issue in front of the Court, Truist has in fact made a bona fide offer to jointly submit a letter (rather than a Precision initiated motion) to ask the Court to expedite the ruling on the motion to stay. Truist did not tell Precision to just sit around and wait and do nothing. Truist only asked Precision to use the mechanism of a joint letter rather than motion practice to save us all time, resources, and costs on motion briefing.

Alternatively, as you seem to have hinted, if there is some limited scope and inexpensive document discovery you seek (in lieu of a motion to compel), such as documents sufficient to identify the owners of certain accounts so that Precision can pursue the so-called 'ghosts,' then Truist might consider such a proposal.

Again, this is Truist showing flexibility and a willingness to meet somewhere in the middle, if at all possible."

Precision ignored these proposals, and again, offered no other alternative, other than full and complete responses to Precision's discovery demands. To quote your email below, "**[Precision's] suggestion would be for [Truist] to properly respond to [Precision's] discovery demands... right now, [Precision is] not going to say that [Truist] can avoid answering [Precision's] demands at all.**"

Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com

troutman pepper

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New York, NY 10022
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From: Daniel Richland <drichland@rflegal.net>

Sent: Friday, September 2, 2022 2:43 PM

To: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>

Cc: Forte, Stephen <stephen.forte@offitkurman.com>

Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

EXTERNAL SENDER

Stephen,

My suggestion would be for you to properly respond to my discovery demands. If there is a specific demand that you feel would be particularly burdensome, I am happy to listen. But right now, I am not going to say that you can avoid answering my demands at all.

Very truly yours,

Daniel H. Richland, Esq.
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From: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>

Sent: Friday, September 2, 2022 2:15 PM

To: Daniel Richland <drichland@rflegal.net>

Cc: Forte, Stephen <stephen.forte@offitkurman.com>

Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

Daniel. Producing all responsive documents to Precision's extensive requested demands is not a middle ground. It is getting Precision's way with no negotiating.

If Precision has an offer of compromise, please make it. That is the purpose of meeting and conferring under the FRCP. Precision has yet to make such an offer.

All Precision has done is repeat the same broken record argument about the case management conference, over and over and over again, as if the magistrate's ruling somehow supersedes any possible ruling from the district judge and as if Truist's right to wait for a ruling on the motion to stay from the district judge is somehow cut off and blocked by the pre-existing CMC order.

Since Precision wants to put this discovery issue in front of the Court, Truist has in fact made a bona fide offer to jointly submit a letter (rather than a Precision initiated motion) to ask the Court to expedite the ruling on the motion to stay. Truist did not tell Precision to just sit around and wait and do nothing. Truist only asked Precision to use the mechanism of a joint letter rather than motion practice to save us all time, resources, and costs on motion briefing.

Alternatively, as you seem to have hinted, if there is some limited scope and inexpensive document discovery you seek (in lieu of a motion to compel), such as documents sufficient to identify the owners of certain accounts so that Precision can pursue the so-called "ghosts," then Truist might consider such a proposal.

Again, this is Truist showing flexibility and a willingness to meet somewhere in the middle, if at all possible.

Please advise.

Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com

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From: Daniel Richland <drichland@rflegal.net>
Sent: Friday, September 2, 2022 1:39 PM
To: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Cc: Forte, Stephen <stephen.forte@offitkurman.com>
Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

EXTERNAL SENDER

Stephen,

I've addressed this multiple times now. Magistrate Scanlon specifically denied your oral application for a stay. I was there. You requested it. You asked the Magistrate to stay your discovery obligations pending the motion to dismiss. She denied that motion, on the record, on the 12th. She stated discovery would proceed. That ruling, as far as I am concerned, is the operative ruling. I am not waiting on the District Judge to decide your motion when we already have a ruling which is the operative ruling and valid until reversed. I am not waiting for your motion to be resolved and thus potentially waive discovery vis-à-vis Truist when discovery closes on the 30th. I want the discovery now. I also want to note that the other third-party defendants are ghosts. You are harming the ability to recover, and thus mitigate damages against Truist, by refusing to cooperate with discovery and discover who those people really are and where the money went before its too late to do something about it. I appreciate that you disagree with the Court's characterization and what was said. However, you are wrong. I was there. You made the oral application. Refusing to comply with the May 12, 2022 Order is contempt.

I cannot speak to what you can do or will do, which is what you underlined and placed in bold. I am telling you that we, my clients, are not waiting for the District Judge to pursue discovery in accordance with Magistrate Scanlon's ruling.

Next, I reject the contention that we have refused to cooperate or find a "middle ground." Your document demand responses were non-responsive. You refused to produce documents based on a pending motion, when there is no stay in effect. You told me there was no Order denying an oral application, when there clearly is. At this point, what you have "offered" is to not respond. That is not acceptable.

If you were providing me documents and there was a discussion to be had on scope, happy to have that discussion. But your response is no documents now, no documents by the end of discovery, and no documents until the District Judge denies your motion. That is unacceptable to my clients. And that will be unacceptable to the Magistrate, especially in light of her May 12, 2022 Order.

Very truly yours,

Daniel H. Richland, Esq.
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From: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Sent: Friday, September 2, 2022 1:29 PM
To: Daniel Richland <drichland@rfllegal.net>
Cc: Forte, Stephen <stephen.forte@offitkurman.com>
Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

Daniel,

No motion to stay was made to the magistrate judge, even though the magistrate judge characterized it as such in her ECF order. I did not state at the conference, "I hereby move the Court" or anything similar. Arguing a position as to a discovery schedule at a conference is not the same as making a motion. But this is all beside the point and irrelevant, as a pending and undecided motion to stay is in fact before the District Judge, a point Precision continues to ignore because Precision has no counter response as to why Truist is not permitted to wait for a ruling from the District Judge.

Even more disconcerting, Truist tried and tried all day today to find a "middle road" compromise with Precision by suggesting a joint letter to avoid motion practice, which Precision also yet again ignored evidencing Precision's bad faith and attempt to steamroll into motion practice. In short, **Precision has refused to negotiate and demanded all documents from Truist with an insistence that Truist surrender its pending motion to stay, or else Precision will commence a sanctions motion against Truist.**

In light of Precision's refusal to negotiate, this meet and confer appears to be at an end.

Truist will respond to a motion to compel, if such is filed. This email chain will be provided to the Court as evidence of Precision's lack of flexibility and willingness to cooperate (and as evidence of Truist's efforts to avoid further motions and to try to achieve an efficient issue resolution). **Finally, to be clear, even now, Truist remains open to a joint letter submission.**

As for the merits of the case, your arguments were made in your opposition briefing on the Rule 12(b)(6). The District Judge will decide the dispositive motion. We believe Truist's motion to dismiss will be granted, and Precision's Third-Party Complaint will be dismissed with prejudice.

In all sincerity, have a great weekend.

Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com

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From: Daniel Richland <drichland@rflegal.net>

Sent: Friday, September 2, 2022 12:41 PM

To: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>

Cc: Forte, Stephen <stephen.forte@offitkurman.com>

Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

EXTERNAL SENDER

Stephen,

Please see the attached. "the third-party Defendant's oral motion to stay discovery is denied for the reasons stated on the record. Discovery will proceed." Your claim that you did not make a motion is patently false. And, as a reminder, I was present at that conference where you made the oral motion, which was denied. But be that as it may, the record here speaks for itself.

Second, as to flimsiness, happy to go toe to toe with you on that. I would respectfully submit that Truist's position is beyond flimsy, contrary to statute, caselaw, equity, and common sense. The fact that you were compelled to rely upon an unpublished decision on Reply speaks volumes about the "strength" of your UCC position. The reason you do not want to conduct discovery is precisely because your position is so flimsy.

As we stand right now, Magistrate Scanlon denied your oral application for a stay on May 12, 2022, as per the attached. If you get a stay from the District Judge, then that would be that. But right now, Magistrate Scanlon has and did rule that you are not entitled to a stay and that discovery will proceed. If you choose to show contempt for her ruling, that is your own decision.

Based on her decision, if you are not going to provide proper responses, then I will have to make the motion under Rule 37. Please review the attached and let me know what you intend to do. I am not, under any circumstance, going to allow your present responses to stand as they are in light of the attached.

Very truly yours,

Daniel H. Richland, Esq.
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From: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Sent: Friday, September 2, 2022 12:18 PM
To: Daniel Richland <drichland@rflegal.net>
Cc: Forte, Stephen <stephen.forte@offitkurman.com>
Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

Daniel,

Your response is non-sensical and inaccurate. First, there was no motion nor application to the magistrate as you pretend there to be by Truist. The words oral motion and/or oral application were not uttered by the undersigned during any conference. Second, at the conference, the Court (including the magistrate) did not have Truist's Rule 12(b)(6) motion before it (or even a pre-motion letter). The dispositive motion now before the court lays the foundation for the flimsy nature of Precision's claims against Truist and the futility of discovery. Third, as you should know, any decision by a magistrate is appealable and/or subject to modification by the district judge. In other words, the magistrate's status conference order is not final on this issue at this time and Truist has a right to get a final ruling from the District Judge before doing anything in discovery. To be clear, Truist did not consent to the magistrate conducting the trial and

management of this action. Thus, while it is correct Truist does not have a stay in discovery from any judge, *it is also correct that Precision does not have a ruling in its favor from the District Judge (or even the magistrate judge) denying Truist's pending motion to stay.*

As mentioned below, **if** the District Judge disagrees with Truist's position on a stay of discovery, Truist respectfully will participate in discovery (without waiving its appellate rights). But again, Truist will not just shotgun and produce documents to Precision while there is a fully pending and timely motion to stay.

Also, as mentioned below, rather than Precision burden the court with a motion to compel (**which would be the second motion filed on the docket on this precise discovery issue**), we suggest a joint letter to the court. We both can note in the letter the discovery deadlines and the nature of the impasse and jointly request a ruling on the motion to stay (or an extension of discovery while the motion to stay is pending). Your email below completely ignores Truist's suggestion of a letter and does not explain why a letter would not resolve the issue.

A motion to compel by Precision only will result in further briefing, further costs, and potentially an appeal to the district judge, leaving the docket even more cluttered, and leaving us (the parties) in the same position as we are in today, waiting for the District Judge to decide the issue of discovery.

Thus, Truist is suggesting the most efficient means of raising the issue for the District Judge to decide.

If you wish to proceed to motion practice despite Truist's very best good faith efforts to avoid burdening the Court, Truist will attach this email chain for the Court's review.

We hope Precision will agree to a joint letter.

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Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com

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From: Daniel Richland <drichland@rflegal.net>
Sent: Friday, September 2, 2022 11:37 AM
To: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Cc: Forte, Stephen <stephen.forte@offitkurman.com>
Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

EXTERNAL SENDER

Stephen,

First, as I noted, all of your responses are refusals to respond. You provided zero documents to me in response to my demands. Second, you are refusing to comply with discovery, as directed by Magistrate Scanlon on May 12, 2022. You asked for, and were denied, an oral application to stay discovery. In moving to dismiss, you have also asked for a stay of discovery, which we opposed. But, as of right now, this moment, you do not have a discovery stay by Court Order. Hence, it is my position that you are willfully refusing to comply with Magistrate Scanlon's May 12, 2022 Order and thus are in contempt of that Order. My preference is for you to respond to my demands. But if you continue refusing to do so, I will have no choice but to notify the Court and seek appropriate relief.

To be clear, based on where we are and the pending end of discovery at the end of September, I do not agree that this is "scorched earth" or a burden of judicial resources. Your position, quite frankly, is frivolous. You have no present stay. The Magistrate has directed you to respond and denied your oral application for a stay. Please confirm that you will be providing me proper responses and your responsive documents. If you are not going to do so, then you leave me no choice but to move to compel under Rule 37.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
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Washingtonville, New York 10992
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(F) 212-390-8873
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From: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Sent: Friday, September 2, 2022 11:02 AM
To: Daniel Richland <drichland@rfllegal.net>
Cc: Forte, Stephen <stephen.forte@offitkurman.com>
Subject: RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

Daniel,

Your client Precision Pro's threat of seeking sanctions against Truist is noted. **However, as you know, there is a pending motion to stay discovery filed by Truist (which your client opposed)**, thus there is no bad faith at all by Truist in waiting on a decision, and thus sanctions are not warranted. In fact, even a motion to compel (without seeking sanctions) is premature and unwarranted. Truist intends to get a ruling on that pending motion to stay from the District Judge.

If the District Judge decides discovery is going forward and denies the motion to stay, Truist will engage in discovery (without waiving any appellate rights).

Of course, if Precision Pro moves the court now while the motion to stay is pending and asks the court for the extreme relief of sanctions, Truist will cross-move and seek its fees and costs for your client knowingly seeking baseless relief.

As set forth above, Truist has articulated a proper, cognizable, and good faith basis to object to discovery while waiting until a final ruling from the District Judge on the pending motion to stay.

As a good faith effort and suggestion to resolve this impasse issue, if your client wishes to join Truist in a letter seeking an expedited ruling on the pending motion to stay, we can prepare something together, and then file with the Court. The faster the District Judge rules on the Motion to Stay, the faster you will know if discovery is moving forward.

Burdening the Court with a motion to compel (and a scorched earth tactic of seeking sanctions) is a waste of judicial resources and the parties' time.

Please let us know if you have wish to file a joint letter or if you have another compromise suggestion before your client burdens the court docket with another motion.

Please note that this email will be an exhibit to any motion practice filed by your client on this issue. Truist stands ready to meet and confer.

Truist reserves all rights.

Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com**troutman pepper**

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New York, NY 10022

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From: Daniel Richland <drichland@rflegal.net>**Sent:** Friday, September 2, 2022 10:32 AM**To:** Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>**Cc:** Forte, Stephen <stephen.forte@offitkurman.com>**Subject:** RE: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC**EXTERNAL SENDER**

Stephen,

These responses are not responsive. Do you intend on providing actual responses or am I going to be compelled to compel you and seek discovery sanctions under Rule 37? Magistrate Judge Scanlon told you that you had to participate in discovery and this is an outright refusal to do so. There is no present stay on discovery.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
5 Fairlawn Drive, Suite 204
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
drichland@rflegal.net

Queens Office:
Richland & Falkowski, PLLC
28-07 Jackson Avenue, 5th Fl.
Long Island City, New York 11101

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From: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Sent: Wednesday, August 31, 2022 5:02 PM
To: Daniel Richland <drichland@rlegal.net>
Cc: Forte, Stephen <stephen.forte@offitkurman.com>
Subject: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

Daniel,

Please see the attached. Please let me know if you wish to discuss and meet and confer.

Yours truly,

Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com

troutman pepper

875 Third Avenue
New York, NY 10022
troutman.com

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From: Daniel Richland <drichland@rflegal.net>
Sent: Tuesday, August 30, 2022 3:10 PM
To: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Cc: Forte, Stephen <stephen.forte@offitkurman.com>
Subject: RE: Activity in Case 1:21-cv-03287-WFK-VMS Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC Order on Motion for Pre Motion Conference

EXTERNAL SENDER

Stephen,

I served you document demands on July 27, 2022 and I have not yet received responses. Please advise.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
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Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
drichland@rflegal.net

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From: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Sent: Tuesday, May 3, 2022 11:54 AM
To: Daniel Richland <drichland@rlegal.net>
Cc: Forte, Stephen <stephen.forte@offitkurman.com>
Subject: RE: Activity in Case 1:21-cv-03287-WFK-VMS Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC Order on Motion for Pre Motion Conference

I will appear, but Truist's position is that there can be no discovery until a Rule 12 motion is adjudicated.

On behalf of Andrew, we appreciate the consent. We will write the Court on pushing the deadlines out.

Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com

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New York, NY 10022
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From: Daniel Richland <drichland@rlegal.net>
Sent: Tuesday, May 3, 2022 11:35 AM
To: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Cc: Forte, Stephen <stephen.forte@offitkurman.com>
Subject: RE: Activity in Case 1:21-cv-03287-WFK-VMS Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC Order on Motion for Pre Motion Conference

EXTERNAL SENDER

Stephen,

Under those circumstances, I will consent to the adjournment. Please note, however, that there is a conference next week, on the 12th, with the Court regarding discovery. Please confirm you will be attending. Notwithstanding your motion, I would like to get started with discovery vis-à-vis Truist.

Very truly yours,

Daniel H. Richland, Esq.
Richland & Falkowski, PLLC
5 Fairlawn Drive, Suite 204
Washingtonville, New York 10992
(O) 212-390-8872 x 402
(F) 212-390-8873
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From: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>

Sent: Tuesday, May 3, 2022 11:01 AM

To: Daniel Richland <drichland@rflegal.net>

Subject: RE: Activity in Case 1:21-cv-03287-WFK-VMS Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC Order on Motion for Pre Motion Conference

My colleague's (Andrew Buxbaum) mother passed away last week. He is responsible for this file.

Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com

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From: Daniel Richland <drichland@rflegal.net>

Sent: Tuesday, May 3, 2022 10:32 AM

To: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>

Subject: RE: Activity in Case 1:21-cv-03287-WFK-VMS Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC Order on Motion for Pre Motion Conference

EXTERNAL SENDER

Can you please advise on why you cannot serve your motion to dismiss by Thursday?

Very truly yours,

Daniel H. Richland, Esq.
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Washingtonville, New York 10992
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(F) 212-390-8873
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From: Steinlight, Stephen J. <Stephen.Steinlight@troutman.com>
Sent: Tuesday, May 3, 2022 10:28 AM
To: Daniel Richland <drichland@rfllegal.net>
Subject: FW: Activity in Case 1:21-cv-03287-WFK-VMS Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC Order on Motion for Pre Motion Conference

Daniel,

We represent Truist. Would your client consent to a modification of the below briefing schedule by two weeks (2 weeks) for all deadlines? If so, we will file a letter to the Court requesting the modification and extending all deadlines by the 2 weeks.

Stephen J. Steinlight

Direct: 212.704.6008

stephen.steinlight@troutman.com

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New York, NY 10022
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From: ecf_bounces@nyed.uscourts.gov <ecf_bounces@nyed.uscourts.gov>
Sent: Tuesday, March 22, 2022 10:26 AM
To: nobody@nyed.uscourts.gov
Subject: Activity in Case 1:21-cv-03287-WFK-VMS Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC Order on Motion for Pre Motion Conference

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U.S. District Court

Eastern District of New York

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The following transaction was entered on 3/22/2022 at 10:26 AM EDT and filed on 3/21/2022

Case Name: Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services, LLC

Case Number: [1:21-cv-03287-WFK-VMS](#)

Filer:

Document Number: [35](#)

Docket Text:

ORDER: Because of the ongoing COVID-19 pandemic, the Court has suspended its pre-motion conference requirement. Therefore, the Court **DENIES** as moot Third-Party Defendant Truist Bank's {"Truist"} request for a pre-motion conference, ECF No. 34, and **GRANTS** Truist leave to file the anticipated motion. The Court **ORDERS** the following briefing schedule: Truist shall submit its motion by Friday, May 6, 2022 at 5:00 P.M.; Plaintiff shall submit its response by Monday, June 6, 2022 at 5 :00 P.M.; and Truist shall submit its reply, if any, by Wednesday, July 6, 2022 at 5 :00 P.M. As a courtesy, the Court requests the parties refrain from filing motion papers until the motion has been fully briefed. So Ordered by Judge William F. Kuntz, II on 3/21/2022. (Herrera, Isaiah)

1:21-cv-03287-WFK-VMS Notice has been electronically mailed to:

Stephen Jay Steinlight stephen.steinlight@troutmansanders.com, FSLECFIntake@troutmansanders.com, LitigationDocketRequests@troutman.com

Jason A Nagi jason.nagi@offitkurman.com, janet.mukherjee@offitkurman.com, rona.cohen@offitkurman.com

Stephen Michael Forte stephen.forte@offitkurman.com, stephenforte@gmail.com

Daniel H. Richland drichland@rfllegal.net

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Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP NYEDStamp_ID=875559751 [Date=3/22/2022] [FileNumber=16692739-0]
[91b277f1126700af4b8895004534d9af57081135b60e16ff13aa6b8d0081b1729c9a
c15921e7ff57939383c35d4ac1f16adc744a165fa1ce756cb937f5f4bb79]]

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